

2.1.1

Lower Willamette Group

Co-Chairperson: Trey Harbert, Port of Portland
Co-Chairperson: Bob Wyatt, NW Natural
Treasurer: Larry Patterson, ATOFINA

RECEIVED

JUN 25

Environmental Cleanup Office

June 19, 2002

Wallace A. Reid
Project Manager
US EPA
1200 Sixth Avenue, ECL-115
Seattle, WA 98101

Chip Humphrey
Project Manager
US EPA
811 SW Sixth Avenue, 3rd Floor
Portland, OR 97204

Tara Karamas
US EPA
Region 10
1200 SW Sixth Avenue
Seattle, WA 98101

Dear Wally, Chip, and Tara:

The Lower Willamette Group (LWG) would like to take this opportunity to state our position with respect to the sharing of site-related documents with the public. There has been some public discussion of this issue with community members and the official Technical Assistance Grant ("TAG") recipient and we believe establishing a protocol for the release of documents is an important step in ensuring good public input on site related activities.

The LWG believes public involvement at this Site is an important part of the success of a timely and efficient cleanup. We have worked closely with EPA's remedial program to negotiate an order for the Remedial Investigation/Feasibility Study ("RI/FS") that includes opportunities to inform the public of our efforts. With both public and private sector members, the LWG acknowledges the importance of public involvement. Decisions that are made with full public involvement provide for no surprises. Members of the community whose needs and opinions have been actively considered by EPA and the LWG are more likely to feel that they have made a difference in the investigation and evaluation process.

The formation of a Community Advisory Group ("CAG") at the site is an important step in helping the public better understand the Superfund process and in receiving their input at the appropriate points in the RI/FS process. This group can be tremendously helpful to all of us at the site. We agree that waiting to inform and involve the public until the CERCLA required public comment periods is a recipe for cleanup delay. We support more frequent and comprehensive public outreach by EPA and the LWG throughout

121 NW Everett Portland OR 97209 ♦ PO Box 3529 Portland OR 97208



PDX/062655/122238/PMD/1012612 I

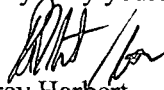
the RI/FS phases at the Site, including regular contact with the CAG and the TAG recipient. The LWG will continue its ongoing commitment to provide information and technical updates to the CAG and the TAG recipient, along with other public involvement efforts.

The LWG agrees with statements made by EPA staff and counsel that documents should be shared with the CAG, the TAG recipient, and other interested community representatives once they have been reviewed by EPA and its partners (DEQ, Tribes and Trustees) and the LWG has an opportunity to revise the documents in accordance with their comments. These revised documents will provide the CAG and other members of the public with a more complete view of plans and activities related to the site than LWG submissions that have not yet undergone the first phase of regulatory review.

The CAG input should be considered an important public involvement step prior to general public comment periods on documents and data. As you know, most CAGs have limited resources and may not be able to provide exhaustive reviews of draft documents that will inevitably be changed by regulators. Ensuring the CAG, TAG recipient, and other members of the community have the most up-to-date documents (including comments by EPA and its partners and documents that have been revised in response to such comments) will give the community the broader opportunity to respond to not just to LWG submissions but to the full spectrum of regulator and trustee input.

We look forward to working to ensure proactive and iterative public involvement at this site. We share EPA's goal to provide for meaningful public input to determine the most efficient and cost effective methods of river cleanup.

Very truly yours,



Trey Harbert
Co-Chair



Larry Patterson
Treasurer

cc: LWG Executive Committee
LWG Legal Committee
Elizabeth McKenna